

United States District Court

FEB 09 2004

DISTRICT OF Hawaii

at 10 o'clock and 08 min. a.m.
WALTER A.Y.H. CHINN, CLERK

UNITED STATES OF AMERICA

V.

DON WILLIAM JACKSON

CRIMINAL COMPLAINT

CASE NUMBER: 04-0127 LEK

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about between 1-30-04 and 2/7/04 in Honolulu county, in the

District of Hawaii defendant(s) did, (Track Statutory Language of Offense)
conspire to distribute 50 grams or more of methamphetamine, its salts, isomers and salts of its isomers, a Schedule II narcotic controlled substance, and methylenedioxymethamphetamine (ecstasy), a Schedule II controlled substance.

in violation of Title 21 United States Code, Section(s) 846 & 841(a)(1)(A)

I further state that I am a(n) FBI Special Agent and that this complaint is based on the following facts:
Official Title

On or about late January and continuing into early February, 2004, Andy George Ortega agreed to ship large amounts of methamphetamine from the Los Angeles area of California to a sub-distributor located in the District of Hawaii. In late January, or early February, 2004, Ortega and others shipped approximately 2 pounds of methamphetamine from California to Hawaii. In addition, during late January, Ortega, and his partner, Don William Jackson, shipped in excess of 2,000 tablets of MDMA, or ecstasy, from Los Angeles to the Honolulu subdistributor for distribution in Hawaii. On February 6, 2004, Ortega arrived in Honolulu from California and met with his subdistributor for the purpose of collecting moneys owed on the series of drug deals between the sub-distributor and Ortega. When Ortega arrived at the meeting, which occurred at a Waikiki area hotel, Ortega brought with him Cedric Bass, another drug associate of Ortega's who came to Hawaii with Ortega for the purpose of transporting back the large amounts of currency they were to collect while in Honolulu. During the meeting, Bass

Continued on the attached sheet and made a part hereof:

☒ Yes☐ No

ATTEST: A True Copy
WALTER A.Y.H. CHINN
Clerk, United States District
Court, District of Hawaii

Signature of Complainant

Deputy

Sworn to before me and subscribed in my presence,

02-09-2004

Date

at

Honolulu, Hawaii

City and State

Leslie E. Kobayashi
United States Magistrate Judge

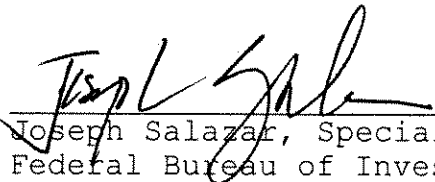
Name & Title of Judicial Officer

Signature of Judicial Officer

SEAL



Addendum to Affidavit

boasted about moving "fifty birds" (drug code for 50 kilograms of cocaine) in Ohio. Ortega purchased Bass' ticket to Hawaii for the express purpose of having Bass assist in the transport of drug monies back to the mainland. Additionally, during the time of the conspiracy, Ortega acted together, in concert, with Don William Jackson to both acquire and ship large amounts of methamphetamine from California to Honolulu. Jackson arrived in Honolulu on February 7, 2004, for the purpose of conducting further drug business with members of the conspiracy in Hawaii. The information contained in this affidavit comes from your affiants personal observations and investigation into phone calls made between Ortega, Jackson and the Honolulu sub-distributor, and the recovery of large amounts of methamphetamine shipped by Ortega and/or Jackson from California to Honolulu, and the admissions and statement of Ortega and Jackson following their individual arrests on February 6 and 7, 2004. Both Ortega and Jackson have admitted to their individual roles in conspiring together, and with others, to ship methamphetamine and ecstasy to Hawaii from California during the time period alleged in this criminal complaint.



Joseph Salazar, Special Agent
Federal Bureau of Investigation

Signed and Sworn to Before me
this 7th day of February, 2004.

Leslie E. Kobayashi
United States Magistrate Judge